

92 RF 75-68

# EG&G ROCKY FLATS

000007043

DIST.	LT	ENC
MIN. A.		
AN. H.S.		
BRANCH. D.B.		
CARNIVAL. G.J.		
COPP. R.D.		
DAVIS. J.G.		
EVERED. J.E.	X	
FERRERA. D.W.		
GOODWIN. R.		
HANNI. B.J.		
HARMAN. L. K.		
HEALY. T.J.		
HILL. R.G. J.G.		
IOEKER. E.H.		
KERSH. J.M.	X	
KIRBY. W.A.		
KUESTER. A.W.		
KRIEG. O.		
LEE. E.M.	X	
MAJESTIC. J.R.		
MARY. C.E.		
MCDONALD. M.M.		
MORGAN. R.V.	X	
POTTER. G.L.	X	
PIZZUTO. V.M.		
SANDLIN. N.B.		
SHEPHERD. D.I.		
SULLIVAN. M.T.		
SWANSON. E.R.		
TALLMAN. K.G.		
WIEBE. J.S.		
WILKINSON. R.R.	X	
WILSON. J. M.		
ZANE. J. O.		
Allhoff. F.H.	X	
Arady. C.E.	X	
Benson. E.A.	X	
Donnison. J.D.	X	
Smith. T.A.	X	
Hanks. E.D.	X	
Ogg. R.T.	X	
Adm. Rec.	X	
E&W Trck'g	X	
CORRES CONTROL	X	X

EG&G ROCKY FLATS, INC.  
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

July 6, 1992

92-RF-7568

Terry A. Vaeth  
Manager  
DOE, RFO

Attn: J. K. Hartman

GUIDANCE FOR NOTIFICATION OF PCB SPILLS/RELEASES - JMK-0644-92

Ref: J. K. Hartman ltr (6808) to J. M. Kersh, Notification of PCB Releases,  
June 15, 1992

In response to your referenced letter, EG&G's recommendation with regard to "identified" PCB releases at RFP is as follows:

- DOE/RFO formally notify the Environmental Protection Agency (EPA), the Colorado Department of Health (CDH) and the appropriate Natural Resource Damage Assessment (NRDA) trustees in accordance with the Interagency Agreement (IAG), Attachment 2, Section I.B.3. (Notification) and I.B.5. (Historical Release Report). Information supporting the documented release should include a complete list of the releases, locations of the releases (site specific maps), supporting analytical data, if available, sample locations and media type, affected media/structures, mitigation measures taken, and recommendations for final disposition of the release(s),
- PCBs detected within an existing Operable Unit (OU) and/or Individual Hazardous Substance Site (IHSS) should be incorporated into the respective OU/IHSS. Characterizing the "nature and extent" of PCB contamination may be accomplished by amending the respective RCRA Facilities Investigation/Remedial Investigation (RFI/RI) work plan by developing a technical memorandum in the form of a Field Sampling Plan (FSP) for PCBs; consequently, the data obtained from implementation of the technical memorandum would be utilized in the development of the RFI/RI report, and
- In the event PCBs are detected external to an OU/IHSS, a PCB specific OU/IHSS should be created for assessment, and if warranted, remedial action. The schedule, scope and applicable IAG criteria would then be negotiated and finalized with the regulatory agencies and consequently incorporated into the IAG for management.

## CLASSIFICATION:

UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE  
Not applicable  
for classification  
exemption

IN REPLY TO RFP CONTROL  
3188 RF 92-11

## ACTION ITEM STATUS

☐ N ☐ CLOSED  
☐ PARTIAL

## LTR APPROVALS:

DATE FOR MDA:

ORIG & TYPIST IN

ATO:let

5F-6469 (Rev. 4/92)

REVIEWED FOR CLASSIFICATION/UCNI

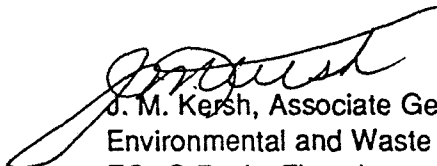
By [Signature]

Date 8-28-93

Terry A. Vaeth  
July 6, 1992  
92-RF-7568  
Page 2

EG&G believes this process and recommendation to be in full compliance with applicable notification requirements of RCRA, CERCLA (e.g., 40 CFR Part 300, Subpart E and 40 CFR Part 302) and the Emergency Planning and Community Right to Know Act (e.g., 40 CFR - Part 355 and 40 CFR Part 372). In addition, this process fully complies with the RFP protocol for notification requirements, pursuant to the IAG, including amending the Historical Release Report every three months to include the newly identified or suspected releases.

If you have any questions regarding this matter, please contact R. T. Ogg of the Remediation Programs Division at extension 8608.



J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

RTO:cet

Orig. and 1 cc - T. A. Vaeth

cc:

F. R. Lockhart	-	DOE, RFO
R. J. Schassburger	-	" "
B. K. Thatcher	-	" "